

Andrew L. Morrison (AM-1071)
K & L GATES LLP
599 Lexington Avenue
New York, New York 10022
212-536-3900
Attorneys for Defendant Mark Wovansiker

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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:
SECURITIES & EXCHANGE COMMISSION, :
Plaintiff, : Case No. 08-cv-04612
v. : (ECF case)
JOHN MICHAEL KELLY, et al., :
Defendants. :
:
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MOTION TO ADMIT COUNSEL PRO HAC VICE

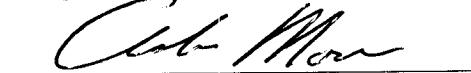
Andrew L. Morrison, a member in good standing of the bar of this Court, respectfully seeks an Order, PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Court for the Southern District of New York, allowing the admission pro hac vice of

Applicant's Name: Stephen G. Topetzes
Firm Name: K & L Gates LLP
Address: 1600 K. Street, N.W.
City/State/Zip: Washington, D.C. 20006
Telephone: (202) 778-9328
Fax: (202) 778-9100
Email Address: stephen.topetzes@klgates.com

Stephen G. Topetzes is a member in good standing of the Bars of the State of Wisconsin and District of Columbia. There are no pending disciplinary proceedings against Mr. Topetzes in any State or Federal court.

Dated: July 16, 2008
New York, New York

Respectfully submitted,



Andrew L. Morrison
SDNY Bar Code: AM-1071
K & L Gates LLP
599 Lexington Avenue
New York, NY 10022-6030
Tel.: (212) 536-3941
Fax: (212) 536-3901

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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SECURITIES & EXCHANGE COMMISSION, :
Plaintiff, : Case No. 08-cv-04612
v. : (ECF case)
JOHN MICHAEL KELLY, et al., :
Defendants. :
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**AFFIDAVIT OF ANDREW L. MORRISON
IN SUPPORT OF MOTION TO ADMIT COUNSEL PRO HAC VICE**

STATE OF NEW YORK)
) ss.
COUNTY OF NEW YORK)

ANDREW L. MORRISON, being duly sworn, deposes and says:

1. I am an attorney duly admitted to practice before the courts of this State and a Partner of the law firm of K & L Gates LLP, counsel for Defendant Mark Wovsaniker in this action.

2. I respectfully submit this affidavit in support of the motion to admit my colleague, Stephen Gregory Topetzes, of K & L Gates Ellis LLP, 1600 K. Street, N.W., Washington, D.C., 20006, Telephone: 202.778.9328, Fax: 202.778.9100, pro hac vice.

3. Mark Wovsaniker requests that Mr. Topetzes appear on his behalf in this action. Mr. Topetzes is familiar with Mark Wovsaniker and the facts at issue in this litigation. He is a member in good standing of the Bars of the State of Wisconsin and District of Columbia,

which are attached hereto as Exhibit A.

4. I respectfully submit a proposed order granting the admission of Stephen Gregory Topetzes, pro hac vice, which is attached hereto as Exhibit B.

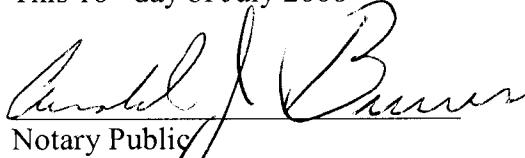
WHEREFORE, it is respectfully requested that the motion to admit Stephen Gregory Topetzes pro hac vice be granted.

Dated: New York, New York
July 16, 2008



Andrew L. Morrison

Subscribed and sworn to before me
This 16th day of July 2008


Notary Public

ARNOLD J. BURRUS
Notary Public, State of New York
No. 41-4720413
Qualified in Queens County
Certificate Filed in New York County
Commission Expires March 30, 2010



WISCONSIN SUPREME COURT

OFFICE OF THE CLERK

110 E. Main Street, Suite 215
P.O. Box 1688
Madison, WI 53701-1688

David R. Schanker
Clerk

Telephone: 608-266-1880
TTY: 800-947-3529
Fax: 608-267-0640
<http://www.wicourts.gov>

CERTIFICATE OF GOOD STANDING

I, David R. Schanker, Clerk of the Supreme Court of Wisconsin certify that the records of this office show that:

STEPHEN G. TOPETZES

*was admitted to practice as an attorney within this state on September 15, 1988
and is presently in good standing in this court.*

Dated: June 25, 2008

A handwritten signature in black ink, appearing to read "DRS".
DAVID R. SCHANKER
Clerk of Supreme Court

**United States District Court
for the District of Columbia
CLERK'S OFFICE
333 Constitution Avenue, NW
Washington, DC 20001**

I, **NANCY M. MAYER-WHITTINGTON**, Clerk of the United States

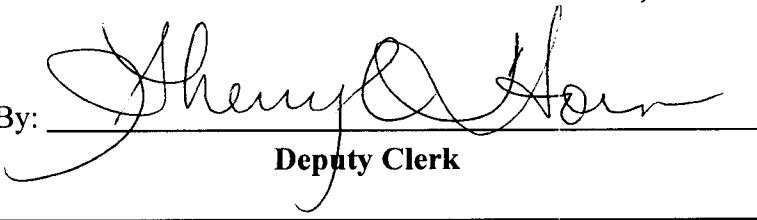
District Court for the District of Columbia, do hereby certify that:

STEPHEN G. TOPETZES

was, on the 10th day of January A.D. 1994 admitted to practice as an Attorney at Law at the Bar of this Court, and is, according to the records of this Court, a member of said Bar in good standing.

In Testimony Whereof, I hereunto subscribe my name and affix the seal of said Court in the City of Washington this 24th day of June A.D. 2008.

NANCY M. MAYER-WHITTINGTON, CLERK

By: 

Deputy Clerk

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
SECURITIES & EXCHANGE COMMISSION, :
Plaintiff, : Case No. 08-cv-04612
v. : (ECF case)
JOHN MICHAEL KELLY, et al., :
Defendants. :
----- X

ORDER FOR ADMISSION PRO HAC VICE

Upon the motion of Andrew L. Morrison, and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that

| | |
|-------------------|------------------------------|
| Applicant's Name: | Stephen G. Topetzes |
| Firm Name: | K & L Gates LLP |
| Address: | 1600 K. Street, N.W. |
| City/State/Zip: | Washington, D.C. 20006 |
| Telephone: | (202) 778-9328 |
| Fax: | (202) 778-9100 |
| Email Address: | stephen.topetzes@klgates.com |

is admitted to practice pro hac vice as counsel for Defendant Mark Wovsaniker in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing

(ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov.

Counsel shall forward the pro hac vice fee to the Clerk of Court.

Dated: July ___, 2008
New York, New York

U.S. District Judge

Andrew L. Morrison (AM-1071)
K & L GATES LLP
599 Lexington Avenue
New York, New York 10022
212-536-3900
Attorneys for Defendant Mark Wovansiker

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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:
SECURITIES & EXCHANGE COMMISSION, : **AFFIDAVIT OF SERVICE**
Plaintiff, :
:
v. :
JOHN MICHAEL KELLY, et al., :
:
Defendants. :
:
----- X

STATE OF NEW YORK)
) ss.:
COUNTY OF NEW YORK)

DEBORAH J. MEYERS, being duly sworn, deposes and says:

1. I am not a party to the action, am over 18 years of age and employed by Kirkpatrick & Lockhart Preston Gates Ellis LLP, 599 Lexington Avenue, New York, New York 10022.

2. On the 16th day of July, 2008, I caused to be served true copies of the Motion to Admit Stephen G. Topetzes Pro Hac Vice, via First Class Mail by depositing said documents, enclosed in postage paid, properly addressed envelope, in an official depository

under the exclusive care and custody of the United States Post Office Department within the State of New York, addressed to the following:

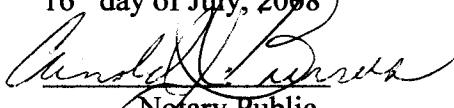
Richard Sung Hong
Division of Enforcement
U.S. Securities and Exchange Commission
100 F. Street, N.E.
Washington, D.C. 20549
Counsel for Plaintiff

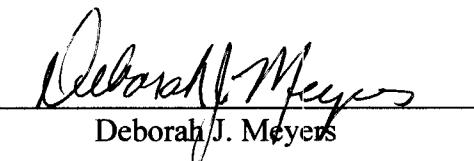
Jonathan R. Tuttle
Debevoise & Plimpton LLP
555 13th Street, N.W.
Washington, D.C. 20004
Counsel for Defendant John Michael Kelly

Gregory G. Little
Hunton & Williams LLP
200 Park Avenue
New York, New York 10166-0091
Counsel for Defendant Joseph A. Ripp

Mark Hulkower
Steptoe & Johnson
1330 Connecticut Ave., N.W.
Washington, DC 20036
Counsel for Defendant Steven Rinder

Sworn to before me this
16th day of July, 2008


Notary Public
ARNOLD J. BURRUS
Notary Public, State of New York
No. 41-4720413
Qualified in Queens County
Certificate Filed in New York County
Commission Expires March 30, 2010


Deborah J. Meyers

12865 6/16
SCANNED

Andrew L. Morrison (AM-1071)
K & L GATES LLP
599 Lexington Avenue
New York, New York 10022
212-536-3900
Attorneys for Defendant Mark Wovansiker

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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SECURITIES & EXCHANGE COMMISSION, :
Plaintiff, : Case No. 08-cv-04612
v. : (ECF case)
JOHN MICHAEL KELLY, et al., :
Defendants. :
:
----- X

**SUPPLEMENTAL AFFIDAVIT OF ANDREW L. MORRISON
IN SUPPORT OF MOTION TO ADMIT COUNSEL PRO HAC VICE**

STATE OF NEW YORK)
) ss.
COUNTY OF NEW YORK)

ANDREW L. MORRISON, being duly sworn, deposes and says:

1. I am a Partner at K&L Gates LLP, counsel for Defendant Mark Wovsaniker in the above captioned action. I am familiar with the proceedings in this case. I make this supplemental statement pursuant to Court's Order dated July 23, 2008 and in further support of the motion, dated July 16, 2008, for an Order admitting Stephen G. Topetzes pro hac vice. I make this statement based on my personal knowledge of the facts set forth herein and in support of Defendant's motion to admit Stephen G. Topetzes as counsel pro hac vice to represent Defendant Mark Wovsaniker in this action.

2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in January of 1988. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

3. I have known Mr. Topetzes since September 2007.

4. Stephen G. Topetzes is a Partner at K&L Gates LLP in Washington, D.C.

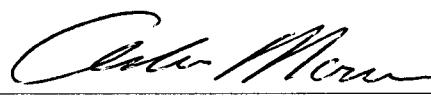
5. I have found Mr. Topetzes to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.

6. Accordingly, I am pleased to move for the admission of Stephen G. Topetzes, pro hac vice.

7. I respectfully submit a proposed order granting the admission of Stephen G. Topetzes, pro hac vice, which is attached hereto as Exhibit A.

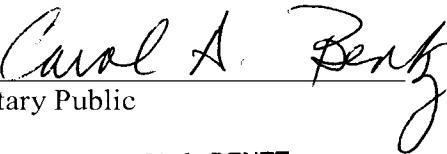
WHEREFORE, it is respectfully requested that the motion to admit Stephen G. Topetzes pro hac vice be granted.

Dated: New York, New York
July 23, 2008



Andrew L. Morrison

Subscribed and sworn to before me
This 23rd day of July 2008



Carol A. Bentz
Notary Public

CAROL A. BENTZ
Notary Public, State of New York
No. 41-4774105
Qualified in Queens County
Commission Expires June 30, 2010

EXHIBIT A

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- X
SECURITIES & EXCHANGE COMMISSION, :
Plaintiff, : Case No. 08-cv-04612
v. : (ECF case)
JOHN MICHAEL KELLY, et al., :
Defendants. :
----- X

ORDER FOR ADMISSION PRO HAC VICE

Upon the motion of Andrew L. Morrison, and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that

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|-------------------|------------------------------|
| Applicant's Name: | Stephen G. Topetzes |
| Firm Name: | K & L Gates LLP |
| Address: | 1600 K. Street, N.W. |
| City/State/Zip: | Washington, D.C. 20006 |
| Telephone: | (202) 778-9328 |
| Fax: | (202) 778-9100 |
| Email Address: | stephen.topetzes@klgates.com |

is admitted to practice pro hac vice as counsel for Defendant Mark Wovsaniker in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing

(ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov.

Counsel shall forward the pro hac vice fee to the Clerk of Court.

Dated: July ___, 2008
New York, New York

U.S. District Judge

Andrew L. Morrison (AM-1071)
K & L GATES LLP
599 Lexington Avenue
New York, New York 10022
212-536-3900
Attorneys for Defendant Mark Wovansiker

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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SECURITIES & EXCHANGE COMMISSION, : **AFFIDAVIT OF SERVICE**
Plaintiff, :
v. :
JOHN MICHAEL KELLY, et al., :
Defendants. :
:
-----X

STATE OF NEW YORK)
) ss.:
COUNTY OF NEW YORK)

ROXANA I. BOBOC, being duly sworn, deposes and says:

1. I am not a party to the action, am over 18 years of age and employed by K&L GATES LLP, 599 Lexington Avenue, New York, New York 10022.
2. On the 23rd day of July, 2008, I caused to be served true copies of the Supplemental Affidavit of Andrew L. Morrison in Support of Motion to Admit Stephen G. Topetzes Pro Hac Vice, via First Class Mail by depositing said documents, enclosed in postage paid, properly addressed envelope, in an official depository

under the exclusive care and custody of the United States Post Office Department within the State of New York, addressed to the following:

Richard Sung Hong
Division of Enforcement
U.S. Securities and Exchange Commission
100 F. Street, N.E.
Washington, D.C. 20549
Counsel for Plaintiff

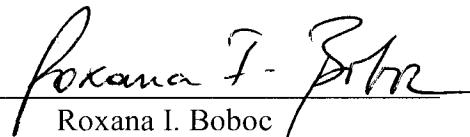
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555 13th Street, N.W.
Washington, D.C. 20004
Counsel for Defendant John Michael Kelly

Gregory G. Little
Hunton & Williams LLP
200 Park Avenue
New York, New York 10166-0091
Counsel for Defendant Joseph A. Ripp

Mark Hulkower
Steptoe & Johnson
1330 Connecticut Ave., N.W.
Washington, DC 20036
Counsel for Defendant Steven Rinder

Sworn to before me this
23rd day of July, 2008

Carol A. Bentz
Notary Public


Roxana I. Boboc

CAROL A. BENTZ
Notary Public, State of New York
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Commission Expires June 30, 2010